

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KWANG JUN LEE,	)	
	)	
Plaintiff,	)	Case No. 16-CV-8610
	)	
v.	)	
	)	Judge Robert M. Dow, Jr.
HANJIN INTERMODAL AMERICA, INC.,	)	Magistrate Judge Sidney Schenkier
d/b/a HANJIN EXPRESS,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Defendant Hanjin Intermodal America, Inc., d/b/a/ Hanjin Express, by and through its counsel Neil H. Dishman and Brenna R. McLean, hereby moves for summary judgment on Plaintiff Kwang Jun Lee’s Fair Labor Standards Act and Illinois Minimum Wage Law claims. In support of its motion, Defendant submits herewith its statement of undisputed material facts, memorandum of law, and materials in support.

Dated: March 19, 2019

Respectfully submitted,

HANJIN INTERMODAL AMERICA, INC.  
d/b/a HANJIN EXPRESS

/s/ Neil H. Dishman  
One of Its Attorneys

Neil H. Dishman  
Brenna R. McLean  
Jackson Lewis P.C.  
150 N. Michigan Ave., Ste. 2500  
Chicago, Illinois 60601  
Tel: (312) 787-4949  
Neil.Dishman@jacksonlewis.com  
Brenna.McLean@jacksonlewis.com

**CERTIFICATE OF SERVICE**

I, Neil H. Dishman, hereby certify that on March 19, 2019, I caused a true and correct copy of the foregoing *Defendant's Motion for Summary Judgment* to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record listed below, who are also registered with the Court's ECF/CM system including:

Ryan J. Kim  
Inseed Law P.C.  
2454 E. Dempster Street, Suite 301  
Des Plaines, IL 60016

By: /s/ Neil H. Dishman